

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI  
OXFORD DIVISION**

**GEORGE WELCH**

**PLAINTIFF**

**VS.**

**CIVIL ACTION NO.: 3:20-cv-00122-NBB-JMV**

**CITY OF HERNANDO, MISSISSIPPI, ET AL.**

**DEFENDANTS**

**MUNICIPAL DEFENDANTS' RESPONSE TO PLAINTIFF'S MOTION TO COMPEL**

Municipal Defendants the City of Hernando, Joseph Harris, Robert Scott, Roger Swatzyna, and Adrian Lewis, respond to Plaintiff George Welch's ("Plaintiff") Motion to Compel. The contemporaneously filed memorandum in support explains in why Plaintiff's motion should be denied.

In addition to the memorandum, Municipal Defendants offer the following exhibits in support:

Exhibit "A" – City of Hernando's Responses to Plaintiff's Discovery Requests

Exhibit "B" – Officer Joseph Harris' Responses to Plaintiff's Discovery Requests

Exhibit "C" – Plaintiff's Good Faith Letter

Exhibit "D" – February 25, 2021 E-Mail

Exhibit "E" – March 3, 2021 E-Mail

For the reasons articulated in the memorandum, Municipal Defendants respectfully request that Plaintiff's Motion to Compel be denied.

Dated: April 7, 2021.

Respectfully submitted,

**PHELPS DUNBAR, LLP**

BY: /s/ *Mallory K. Bland*

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**ATTORNEYS FOR MUNICIPAL  
DEFENDANTS**

**CERTIFICATE OF SERVICE**

I certify that, on April 7, 2021, I had a copy of this document electronically filed with the Clerk of the Court, using the CM/ECF system, which sent notification of such filing to all counsel of record.

*/s/ Mallory K. Bland*  
MALLORY K. BLAND